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CLERK U S DISTRICT COURT DISTRICT OF ARIZONA	
BY _____	DEPUTY _____

GARY M. RESTAINO  
United States Attorney  
District of Arizona

DIMITRA H. SAMPSON  
Arizona State Bar No. 019133  
Email: dimitra.sampson@usdoj.gov  
JILLIAN BESANCON  
California State Bar No. 285869  
Email: jillian.besancon@usdoj.gov  
RYAN POWELL  
Arizona State Bar No. 025695  
Email: ryan.powell@usdoj.gov  
Assistant U.S. Attorneys  
Two Renaissance Square  
40 N. Central Ave., Suite 1800  
Phoenix, Arizona 85004  
Telephone: 602-514-7500  
Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
DISTRICT OF ARIZONA

United States of America,  
  
Plaintiff,  
  
vs.

Samuel Rappylee Bateman,  
  
Defendant.

CR-22-08092-001-PCT-SMB

**PLEA AGREEMENT**

Plaintiff, the United States of America, and the defendant, SAMUEL RAPPYLEE BATEMAN, hereby agree to resolve this matter on the following terms and conditions:

**1. PLEA**

The defendant will plead guilty to Count 2 of the Third Superseding Indictment, Conspiracy to Commit Transportation of a Minor for Criminal Sexual Activity, in violation of Title 18, United States Code (U.S.C.), Section 2423(a) and (e); and Count 53 of the Third Superseding Indictment, Conspiracy to Commit Kidnapping, in violation of Title 18, United States Code (U.S.C.), Section 1201(c), both Class A felony offenses.

1       **2.     MAXIMUM PENALTIES**

2           a.     A violation of 18 U.S.C. § 2423(a) and (e) is punishable by a maximum fine  
3     of \$250,000, a term of imprisonment of ten years to life, or both a fine and term of  
4     imprisonment, and a term of supervised release of five years to life. A violation of 18  
5     U.S.C. § 1201(c) is punishable by a maximum fine of \$250,000, a term of imprisonment  
6     of up to life, or both a fine and term of imprisonment, and a term of supervised release of  
7     five years.

8           b.     According to the Sentencing Guidelines issued pursuant to the Sentencing  
9     Reform Act of 1984, the Court shall order the defendant to:

10           (1)    make restitution to any victim of the offense pursuant to 18 U.S.C.  
11     § 3663 and/or 3663A, unless the Court determines that restitution would not be  
12     appropriate;

13           (2)    pay a fine pursuant to 18 U.S.C. § 3572, unless the Court finds that a  
14     fine is not appropriate;

15           (3)    serve a term of supervised release when required by statute or when a  
16     sentence of imprisonment of more than one year is imposed (with the understanding that  
17     the Court may impose a term of supervised release in all other cases);

18           (4)    pay upon conviction a \$100 special assessment for each count to  
19     which the defendant pleads guilty pursuant to 18 U.S.C. § 3013; and

20           (5)    pay upon conviction an additional \$5,000 special assessment pursuant  
21     to 18 U.S.C. § 3014(a), unless the Court determines that the defendant is indigent.

22           c.     The Court is required to consider the Sentencing Guidelines in determining  
23     the defendant's sentence. However, the Sentencing Guidelines are advisory, and the Court  
24     is free to exercise its discretion to impose any reasonable sentence up to the maximum set  
25     by statute for the crime(s) of conviction, unless there are stipulations to the contrary that  
26     the Court accepts.

27       **3.     AGREEMENTS REGARDING SENTENCING**

28           a.     Sentencing Agreements. Pursuant to Fed. R. Crim. P. 11(c)(1)(C), the United

1 States and the defendant stipulate that the defendant's sentence shall be no less than 20  
2 years and no greater than 50 years' imprisonment, followed by lifetime supervised release.

3 b. Agreement Contingent on Plea by Co-Defendants. Pursuant to Fed. R. Crim.  
4 P. 11(c)(1)(C), the United States and the defendant stipulate that this plea is contingent on  
5 a guilty plea being entered by each of the co-defendants named in the Third Superseding  
6 Indictment and accepted by the Court. The defendant understands that if any of his co-  
7 defendants fail to accept their plea agreements for any reason or do not enter guilty pleas,  
8 the United States may, but is not required to, withdraw from the plea agreement, in which  
9 case the parties would not be bound by any of the terms of this plea agreement, including  
10 the recommendations, stipulations, and other agreements herein, or any of the facts  
11 contained in the factual basis. If any of his co-defendants withdraw their guilty pleas, or if  
12 the Court rejects any of his co-defendants' pleas, the United States may, but is not required  
13 to, withdraw from this plea agreement with the defendant. Only the United States (not the  
14 defendant) may elect to withdraw from the plea agreement.

15 c. Stipulation: Sex Offender Conditions. Pursuant to Fed. R. Crim. P.  
16 11(c)(1)(C), the United States and the defendant stipulate, and the defendant agrees, to the  
17 following sex offender conditions during the term of supervised release: within three days  
18 from release from prison, the defendant shall register as a sex offender in accordance with  
19 tribal, state, and federal law in any jurisdiction in which he resides, is employed, or is a  
20 student, and will provide the supervising probation officer with verification of registration.  
21 During the term of supervised release, the defendant shall undergo sex offender treatment  
22 and counseling as directed by the probation department and as ordered by the Court. Such  
23 treatment may include physiological testing, including clinical polygraph testing. If the  
24 probation department, and the Court, in determining the most appropriate sentence, deems  
25 it appropriate, the defendant shall submit to a presentence sex offender evaluation pursuant  
26 to 18 U.S.C. § 3552(b). Such sex offender evaluation shall be conducted under the  
27 standardized conditions set forth by the examiner. The defendant's attorney shall not be  
28 present during any part of the examination unless otherwise authorized by the examiner in

1 advance of said evaluation or as otherwise agreed upon between the parties in writing. The  
2 parties agree that any statements used in connection with the examination shall not be used  
3 in the instant prosecution or in any subsequent federal prosecution of the defendant in the  
4 District of Arizona. As a condition of supervised release, the defendant shall cooperate in  
5 the collection of a DNA sample as authorized in 18 U.S.C. § 3583(d).

6 d. Restitution. Pursuant to 18 U.S.C. § 3663, 3663A and/or 2248, the defendant  
7 specifically agrees to pay full restitution to all victims in an amount to be determined by  
8 the court, but in no event, more than \$1,000,000.00 per victim. "Victims" include persons  
9 or entities directly or proximately harmed by defendant's "relevant conduct" including  
10 conduct pertaining to any dismissed counts or uncharged conduct, as defined by U.S.S.G.  
11 §1B1.3, regardless of whether such conduct constitutes an "offense" under 18 U.S.C. §§  
12 2259, 3663, 3663(A) or 2248. Pursuant to 18 U.S.C. §§ 3663 and 3664(j)(1), "victims"  
13 also include persons or entities (whether private or government: state, federal or tribal) that  
14 have paid or costs related to defendant's conduct, including insurance providers and health  
15 care providers (including those such as Medicaid, Medicare and AHCCCS). Even if the  
16 victim did not suffer physical injury, the defendant expressly agrees to pay restitution for  
17 expenditures and future expenses related to treatment for mental or emotional trauma  
18 suffered by the victims. Such expenditures shall include, but are not limited to: mental  
19 health treatment, counseling, and in-patient treatment. The defendant understands that  
20 such restitution will be included in the Court's Order of Judgment and that an unanticipated  
21 restitution amount will not serve as grounds to withdraw the defendant's guilty plea or to  
22 withdraw from this plea agreement.

23 e. Assets and Financial Responsibility. The defendant shall make a full  
24 accounting of all assets in which the defendant has any legal or equitable interest. The  
25 defendant shall not (and shall not aid or abet any other party to) sell, hide, waste, spend, or  
26 transfer any such assets or property before sentencing, without the prior approval of the  
27 United States (provided, however, that no prior approval will be required for routine, day-  
28 to-day expenditures). The defendant also expressly authorizes the United States Attorney's

1 Office to immediately obtain a credit report as to the defendant in order to evaluate the  
2 defendant's ability to satisfy any financial obligation imposed by the Court. The defendant  
3 also shall make full disclosure of all current and projected assets to the U.S. Probation  
4 Office immediately and prior to the termination of the defendant's supervised release or  
5 probation, such disclosures to be shared with the U.S. Attorney's Office, including the  
6 Financial Litigation Unit, for any purpose. Finally, the defendant shall participate in the  
7 Inmate Financial Responsibility Program to fulfill all financial obligations due and owing  
8 under this agreement and the law.

9 f. Acceptance of Responsibility. If the defendant makes full and complete  
10 disclosure to the U.S. Probation Office of the circumstances surrounding the defendant's  
11 commission of the offense, and if the defendant demonstrates an acceptance of  
12 responsibility for this offense up to and including the time of sentencing, the United States  
13 will recommend a two-level reduction in the applicable Sentencing Guidelines offense  
14 level pursuant to U.S.S.G. § 3E1.1(a). If the defendant has an offense level of 16 or more,  
15 the United States will move for an additional one-level reduction in the applicable  
16 Sentencing Guidelines offense level pursuant to U.S.S.G. § 3E1.1(b).

17 g. Non-Binding Recommendations. The defendant understands that  
18 recommendations are not binding on the Court. The defendant further understands that the  
19 defendant will not be permitted to withdraw the guilty plea if the Court does not follow a  
20 recommendation.

21 **4. AGREEMENT TO DISMISS OR NOT TO PROSECUTE**

22 a. Pursuant to Fed. R. Crim. P. 11(c)(1)(A), the United States Attorney's Office  
23 for the District of Arizona, at the time of sentencing, shall dismiss Counts 1, 3-11, 13-47,  
24 50-52, and 54-56 of the Third Superseding Indictment (or the most recent Indictment in  
25 this case) against this defendant only.

26 b. This agreement does not, in any manner, restrict the actions of the United  
27 States in any other district or bind any other United States Attorney's Office.

28

1     **5.     COURT APPROVAL REQUIRED; REINSTITUTION OF PROSECUTION**

2             a.     If the Court, after reviewing this plea agreement, concludes that any  
3     provision contained herein is inappropriate, it may reject the plea agreement and give the  
4     defendant the opportunity to withdraw the guilty plea in accordance with Fed. R. Crim. P.  
5     11(c)(5).

6             b.     If the defendant's guilty plea or plea agreement is rejected, withdrawn,  
7     vacated, or reversed at any time, this agreement shall be null and void, the United States  
8     shall be free to prosecute the defendant for all crimes of which it then has knowledge and  
9     any charges that have been dismissed because of this plea agreement shall automatically  
10    be reinstated. In such event, the defendant waives any and all objections, motions, and  
11    defenses based upon the Statute of Limitations, the Speedy Trial Act, or constitutional  
12    restrictions in bringing later charges or proceedings. The defendant understands that any  
13    statements made at the time of the defendant's change of plea or sentencing may be used  
14    against the defendant in any subsequent hearing, trial, or proceeding subject to the  
15    limitations of Fed. R. Evid. 410.

16    **6.     WAIVER OF DEFENSES AND APPEAL RIGHTS**

17             The defendant waives (1) any and all motions, defenses, probable cause  
18    determinations, and objections that the defendant could assert to the indictment or  
19    information; and (2) any right to file an appeal, any collateral attack, and any other writ or  
20    motion that challenges the conviction, an order of restitution or forfeiture, the entry of  
21    judgment against the defendant, or any aspect of the defendant's sentence, including the  
22    manner in which the sentence is determined, including but not limited to any appeals under  
23    18 U.S.C. § 3742 (sentencing appeals) and motions under 28 U.S.C. §§ 2241 and 2255  
24    (habeas petitions), and any right to file a motion for modification of sentence, including  
25    under 18 U.S.C. § 3582(c) (except for the right to file a compassionate release motion under  
26    18 U.S.C. § 3582(c)(1)(A) and to appeal the denial of such a motion). This waiver shall  
27    result in the dismissal of any appeal, collateral attack, or other motion the defendant might  
28    file challenging the conviction, order of restitution or forfeiture, or sentence in this case.



1 This waiver shall not be construed to bar an otherwise-preserved claim of ineffective  
2 assistance of counsel or of "prosecutorial misconduct" (as that term is defined by Section  
3 II.B of Ariz. Ethics Op. 15-01 (2015)).

4 **7. DISCLOSURE OF INFORMATION**

5 a. The United States retains the unrestricted right to provide information and  
6 make any and all statements it deems appropriate to the U.S. Probation Office and to the  
7 Court in connection with the case.

8 b. Any information, statements, documents, and evidence that the defendant  
9 provides to the United States pursuant to this agreement may be used against the defendant  
10 at any time.

11 c. The defendant shall cooperate fully with the U.S. Probation Office. Such  
12 cooperation shall include providing complete and truthful responses to questions posed by  
13 the U.S. Probation Office including, but not limited to, questions relating to:

- 14 (1) criminal convictions, history of drug abuse, and mental illness; and  
15 (2) financial information, including present financial assets or liabilities  
16 that relate to the ability of the defendant to pay a fine or restitution.

17 **8. FORFEITURE, CIVIL, AND ADMINISTRATIVE PROCEEDINGS**

18 Nothing in this agreement shall be construed to protect the defendant from  
19 administrative or civil forfeiture proceedings or prohibit the United States from proceeding  
20 with and/or initiating an action for civil forfeiture. Pursuant to 18 U.S.C. § 3613, all  
21 monetary penalties, including restitution imposed by the Court, shall be due immediately  
22 upon judgment, shall be subject to immediate enforcement by the United States, and shall  
23 be submitted to the Treasury Offset Program so that any federal payment or transfer of  
24 returned property the defendant receives may be offset and applied to federal debts (which  
25 offset will not affect the periodic payment schedule). If the Court imposes a schedule of  
26 payments, the schedule of payments shall be merely a schedule of minimum payments and  
27 shall not be a limitation on the methods available to the United States to enforce the  
28 judgment.

1     **9.     ELEMENTS**

2                             **Conspiracy (Count 2)**

3             Beginning at a time unknown, but at least from on or about September 4, 2019  
4     through on or about September 13, 2022, in the District of Arizona and elsewhere:

- 5             1.     There was an agreement between two or more persons to commit a violation  
6                   of 18 U.S.C. § 2423(a), Transportation of a Minor for Criminal Sexual Activity; and  
7             2.     The defendant became a member of the conspiracy knowing of at least one  
8                   of its objects and intending to help accomplish it.

9                             **Transportation of a Minor for Criminal Sexual Activity**

10            Beginning at a time unknown, but at least from on or about September 4, 2019  
11   through on or about September 13, 2022, in the District of Arizona and elsewhere:

- 12            1.     The defendant or co-conspirator knowingly transported or caused to be  
13                  transported Jane Does 3-11 in interstate commerce;  
14            2.     The defendant or co-conspirator did so with the intent that Jane Does 3-11  
15                  would engage in sexual activity for which any person can be charged with a criminal  
16                  offense; and  
17            3.     Jane Does 3-11 were under the age of eighteen years at the time.

18                            **Conspiracy (Count 53)**

19            Beginning at a time unknown, but at least from on or about November 26, 2022  
20   through on or about December 1, 2022, in the District of Arizona and elsewhere:

- 21            1.     There was an agreement between two or more persons to commit a violation  
22                  of 18 U.S.C. §§ 1201(a)(1) and (b), Kidnapping;  
23            2.     The defendant became a member of the conspiracy knowing of at least one  
24                  of its objects and intending to help accomplish it; and  
25            3.     One of the members of the conspiracy performed at least one overt act on or  
26                  after November 26, 2022 for the purpose of carrying out the conspiracy.

27                            **Kidnapping**

28            Beginning at a time unknown, but at least from on or about November 26, 2022



1 through on or about December 1, 2022, in the District of Arizona and elsewhere:

- 2 1. The defendant or co-conspirator seized, confined, inveigled, decoyed,  
3 kidnapped, abducted, or carried away Jane Does 4, 8 and 9;
- 4 2. The defendant or co-conspirator held Jane Does 4, 8 and 9 against their  
5 will;\* and
- 6 3. The defendant or co-conspirator intentionally transported Jane Does 4, 8 and  
7 9 across state lines, or traveled in interstate commerce, or used a means, facility, or  
8 instrumentality of interstate commerce.

9 \* "If the victim is of such an age or mental state as to be incapable of having a recognizable  
10 will, the confinement then must be against the will of the parents or legal guardian of the  
11 victim." *Chatwin v. United States*, 326 U.S. 455, 460 (1946).

## 12 10. FACTUAL BASIS

13 a. The defendant admits that the following facts are true and that if this matter  
14 were to proceed to trial the United States could prove the following facts beyond a  
15 reasonable doubt:

16 Beginning in 2019, the defendant, SAMUEL RAPPYLEE BATEMAN,  
17 proclaimed himself to be a Prophet of the Fundamentalist Church of Jesus  
18 Christ of Latter-Day Saints ("FLDS"), a subset of the fundamentalist  
19 Mormon denominations whose members practice polygamy. At the time,  
20 most FLDS members recognized their imprisoned leader, Warren Jeffs, as  
the Prophet.

21 In 2019 and 2020, the defendant began taking female adults and children  
22 from his male followers and proclaiming them to be his "wives." The  
23 defendant amassed over twenty "wives," including child "brides" as young  
as nine years old. None of these "marriages" were legally recognized.

24 The defendant had followers residing in Lincoln, Nebraska; Cedar City,  
25 Utah; Monument, Colorado; and Colorado City, Arizona. He traveled to and  
26 between these locations to increase his following and claim "wives," ten of  
27 whom were under the age of eighteen. His intent was to engage in sexual  
28 activity with minor girls, and he did so on a regular basis. By March 2021,  
the defendant had moved his followers to Colorado City, Arizona, where he  
resided with his "wives" until September 13, 2022.

1 There were no legal or formal ceremonies to commemorate “marriage,” but  
2 “marriage” signified the beginning of the defendant’s sexual relationship  
3 with each of his “wives.” Upon “marriage,” the defendant engaged in sexual  
4 intercourse with his adult “wives” and impregnated several of them. He  
5 usually initiated physical contact with his child “brides” by hugging, kissing,  
6 and sleeping with them in the same bed, before ultimately engaging in sexual  
7 intercourse with them at a later time, except for Jane Doe 8.

8 The defendant originally resided in Colorado City, Arizona. Traveling  
9 between Arizona, Nebraska, Colorado, and Utah, the defendant and his co-  
10 conspirators began bringing his “wives,” including his child “brides,” back  
11 to Colorado City, Arizona. The defendant and his co-conspirators used  
12 cellular phones, other electronic devices, electronic communications, the  
13 Internet, vehicles, interstate highways, and hotels to induce, persuade, and  
14 encourage the minor victims to “marry” him, travel with and to him, and to  
15 engage in sexual activity.

16 As part of the conspiracy, the defendant and his co-conspirators engaged in  
17 sexual activity in the presence of minors. The defendant encouraged the  
18 minors to participate in the sexual activity and had his co-conspirators train  
19 them to do so. In one instance, the defendant and his co-conspirators engaged  
20 in a group sexual activity involving minors, using electronic devices and  
21 video communication to facilitate the participation of other co-conspirators  
22 and a minor in different states.

23 On or about September 4, 2019, the defendant traveled from Colorado City,  
24 Arizona, to Rifle, Colorado, to take his first adult “wife,” co-defendant  
25 MARONA JOHNSON. The defendant took co-defendant MARONA  
26 JOHNSON back to Colorado City, Arizona, where he later impregnated her.

27 On or about October 26, 2019, after a trip from Colorado City, Arizona, to  
28 Lincoln, Nebraska, the defendant took the second of his adult “wives,” S.J.  
The defendant took S.J. back to Colorado City, Arizona, where he later  
impregnated her. Both of these adult “wives” were the daughters of co-  
conspirator, M.J.

On or about March 26, 2020, the defendant spoke to M.J. and told him that  
God gave M.J.’s daughter, Jane Doe 6 (then age nine), to the defendant. On  
or about May 3, 2020, the defendant traveled from Colorado City, Arizona,  
to Lincoln, Nebraska, and at a hospital in Omaha, Nebraska, the defendant  
“rebuked” M.J. in front of his family.

On or between May 3 and May 5, 2020, the defendant, Jane Doe 6, and M.J.

1 sat in a van together, and then M.J.'s family was told Jane Doe 6 was going  
2 with the defendant. The defendant told M.J. he would be blessed for his  
3 loyalty. On or about May 4, 2020, the defendant took Jane Doe 6 as a child  
"bride."

4 On or between May 4 and May 8, 2020, the defendant took Jane Doe 6 from  
5 Lincoln, Nebraska, to Colorado City, Arizona. On or about May 8, 2020, the  
6 defendant took Jane Doe 6 to St. George, Utah, and had her lay on his lap as  
he drove.

7 On or between May 19 and August 9, 2020, the defendant had a video call  
8 with his biological daughter, showed her Jane Doe 6, and introduced Jane  
9 Doe 6 as his daughter's "new mother." The defendant told his daughter that  
10 Jane Doe 6 was nine years old, and that he "married" Jane Doe 6 "in full  
11 consent of her father." On or between May 19 and August 9, 2020, the  
defendant had another video call with his daughter, during which he hugged  
and kissed Jane Doe 6.

12 On or about June 4, 2020, the defendant documented in his journal that he  
13 chastened Jane Doe 6 "quite hard today because she wouldn't obey quickly,  
14 lingered and lingered until something had to change. After a while, she came  
15 weeping and confessing."

16 On or between June 6 and June 7, 2020, the defendant traveled with Jane Doe  
17 6 from Colorado City, Arizona, to Lincoln, Nebraska.

18 On or about June 20, 2020, the defendant recorded in his journal that M.J.  
19 had been "laboring" with his seventeen-year-old daughter, co-defendant  
20 MORETTA ROSE JOHNSON, and she voiced "she wants to do Heavenly  
Father's will and asked her father [M.J.] to help her."

21 On or about June 28, 2020, the defendant returned from Lincoln, Nebraska,  
22 to Colorado City, Arizona, with Jane Doe 6. On or about June 30, 2020, the  
23 defendant sent a lengthy email to M.J. stating in relevant part: "[m]y heart is  
24 offended greatly at [J.J.] and [co-defendant MORETTA ROSE JOHNSON]  
25 for thinking evil of me, thinking I am doing my own thing. They need an  
26 example and don't have one. . . God is so offended at you for the way you  
27 have trampled over top of me that He gave me [co-defendant BRENDA  
28 BARLOW] and [co-defendant DONNAE BARLOW] . . . You can all reject  
it if you want, see if I care. Your children will fall by the dozens unless you  
repent in sackcloth and ashes." J.J. is M.J.'s legal wife. At the time, co-  
defendants BRENDA and DONNAE BARLOW were M.J.'s spiritual  
"wives."

1 On or about July 1, 2020, the defendant wrote in his journal "God seems to  
2 whisper '[Jane Doe 3]'." Jane Doe 3 was the fourteen-year-old daughter of  
3 M.J. On or about July 2, 2020, M.J. told the defendant that "the Lord" told  
M.J. to give the defendant his Toyota van.

4 On or about July 4, 2020, co-defendants BRENDA BARLOW, DONNAE  
5 BARLOW, and MORETTA ROSE JOHNSON traveled in M.J.'s Toyota van  
6 from Lincoln, Nebraska, to Colorado City, Arizona, to be with the defendant.

7 On or between July 3 and July 4, 2020, the defendant slept in the same bed  
8 with Jane Doe 6. On or about July 5, 2020, the defendant introduced his six  
9 wives, including Jane Doe 6, to his former wife, as well as co-defendant  
LADELL BISTLINE, JR.

10 On or about July 13, 2020, Arizona Department of Child Safety (hereinafter  
11 "AZ DCS") personnel visited the defendant's home in Colorado City,  
12 Arizona because of concerns involving Jane Doe 6. The defendant initially  
13 refused to allow them inside. He was present when AZ DCS personnel spoke  
to Jane Doe 6, and he gestured to her whether to answer their questions.

14 On or about July 14, 2020, AZ DCS contacted Jane Doe 6's mother, A.B.,  
15 who was still residing in Lincoln, Nebraska. She justified Jane Doe 6 living  
16 with the defendant in Colorado City, Arizona, by saying Jane Doe 6 (still age  
nine) was helping care for her sister's baby.

17 On or about August 8, 2020, the defendant traveled to Cedar City, Utah to  
18 meet co-defendants LADELL BISTLINE, JR. and JOSEPHINE BARLOW  
19 BISTLINE and their three children, including Jane Doe 8 (then age nine) and  
20 Jane Doe 9 (then age ten). They all traveled from Cedar City, Utah, to  
Lincoln, Nebraska.

21 On or about August 10, 2020, the defendant conducted training on "the  
22 Prayer pamphlet" to M.J.'s family, co-defendants LADELL BISTLINE, JR.  
23 and JOSEPHINE BARLOW BISTLINE, and their three children, including  
Jane Does 8 and 9.

24 On or between July 1 and August 14, 2020, M.J. encouraged his daughter,  
25 Jane Doe 3 (then age fourteen) to marry the defendant. On or about August  
26 13, 2020, the defendant met with Jane Doe 3 and listened to her "testimony"  
27 of "Uncle Warren [Jeffs] coming to her." On or between August 13 and  
28 August 14, 2020, the defendant took Jane Doe 3 (then age fourteen) as a child  
"bride."

1 On or about August 17, 2020, the defendant told M.J. that God told him that  
2 M.J.'s daughter, Jane Doe 5 (then age thirteen), belonged to the defendant.  
3 On or about August 18, 2020, M.J. told the defendant that Jane Doe 5 was  
ready whenever the defendant was.

4 On or between August 22 and August 23, 2020, as recorded by the defendant,  
5 he "slept with Angel Mother [Jane Doe 3] tonight!"

6 On or between August 18 and August 31, 2020, the defendant took Jane Doe  
7 5 (then age thirteen) as a child "bride."

8 On or about September 5, 2020, the defendant and M.J. agreed that the  
9 defendant would move into M.J.'s house in Lincoln, Nebraska, with all his  
"wives" and take M.J.'s bedroom.

10 On or about September 25, 2020, the defendant "got after" Jane Does 3 and  
11 5 "quite firmly for saying they wanted to be single again," until they both  
12 confessed to his satisfaction.

13 On or about September 27, 2020, the defendant told M.J. that God told the  
14 defendant that M.J.'s daughter, Jane Doe 4 (then age ten), "should be by my  
15 side." On or about September 29, 2020, the defendant took Jane Doe 4 as a  
child "bride."

16 On or about September 29, 2020, the defendant drove with M.J., J.J. and their  
17 daughter, Jane Doe 4, and the defendant kissed Jane Doe 4.

18 On or between September 29, 2020 and January 31, 2021, in M.J.'s bedroom  
19 that had been given to the defendant, the defendant was first "intimate" with  
20 Jane Doe 4.

21 On or between September 29, 2020 and March 18, 2021, the defendant  
22 touched Jane Doe 4's (then age ten or eleven) breasts in front of her mother,  
J.J., in a vehicle.

23 On or about October 25, 2020, the defendant sent text messages to one of his  
24 "wives," S.J., during Sunday School, about Jane Doe 7, saying "show [Jane  
25 Doe 7] this text" and "I see [Jane Doe 7] has made a great effort of  
26 improvement," which S.J. showed to Jane Doe 7.

27 On or about October 29, 2020, the defendant took M.J.'s wife, A.B., mother  
28 of Jane Does 5 and 6, as a "wife." On or about October 29, 2020, the  
defendant "rebuked" one of M.J.'s sons in front of others and told him "if he

1 stood up to harm me I would throw him through the wall. And that he had  
2 lost an eternal blessing in [Jane Doe 7]. God was going to give her to him  
3 but he spit in The Lord's face so He gave her to me." On or about October  
4 29, 2020, the defendant took Jane Doe 7 (then age eleven) as a child "bride."

5 On or about October 29, 2020, the defendant took Jane Doe 7 from Lincoln  
6 to Omaha, Nebraska, and "rebuked her strongly" when she would not speak.  
7 The defendant told Jane Doe 7 if she didn't "want this I would take her back  
8 this instant. She repented quickly."

9 On or between October 29, 2020 and January 15, 2021, in Lincoln, Nebraska,  
10 the defendant was "intimate" with Jane Doe 7 (then age eleven or twelve).

11 On or about November 7, 2020, co-defendants JOSEPHINE BARLOW  
12 BISTLINE and NAOMI BISTLINE "married" the defendant. On or about  
13 November 7, 2020, co-defendant LADELL BISTLINE, JR. spoke to the  
14 defendant on the phone and told him that "The Spirit" told defendant  
15 BISTLINE, JR. that he would be "sealed" to the defendant.

16 On or about November 7, 2020, after the defendant spoke with co-defendant  
17 LADELL BISTLINE, JR. on the phone, M.J. told the defendant that God told  
18 M.J. he belonged to the defendant as well.

19 On or about November 7, 2020, the defendant called co-defendants  
20 BRENDA BARLOW and MARONA JOHNSON, and M.J. called his wife,  
21 J.J., and they all met at a hotel room. The defendant directed everyone to get  
22 naked and told M.J. and J.J. to perform sex acts in front of co-defendants  
23 BRENDA BARLOW and MARONA JOHNSON, so that they could learn  
24 how to sexually please the defendant.

25 On or about November 9, 2020, the defendant coordinated a "sacred  
26 ordinance" to emulate the "Washing of the Feet" in a hotel room in Lincoln,  
27 Nebraska. The defendant told everyone to get naked, washed the feet of M.J.  
28 and co-defendant LADELL BISTLINE, Jr., and then claimed he needed to  
have sex with M.J. to bond with him. When the defendant had difficulty  
getting an erection, he demanded the women and girls assist. J.J. and co-  
defendants BRENDA BARLOW and DONNAE BARLOW were there  
participating, as well as some of the child "brides."

On or about November 14, 2020, co-defendants LADELL BISTLINE, JR.  
and JOSEPHINE BARLOW BISTLINE traveled to Utah and purchased a  
white Yukon for the defendant.



1 On or about November 20, 2020, the defendant and co-defendant NAOMI  
2 BISTLINE left Lincoln, Nebraska with Jane Doe 3 and others. On or about  
3 November 21, 2020, the defendant and his "wives" stopped in Monument,  
Colorado to provide lessons to Jane Doe 11's family.

4 On or about November 23, 2020, in the evening, in Colorado City, Arizona,  
5 the defendant gave Jane Doe 3 and some of his other "wives" to co-defendant  
6 LADELL BISTLINE, JR. to comfort him since the defendant had taken co-  
7 defendant BISTLINE, JR.'s wife. The defendant also called some of his  
8 "wives" who were in Lincoln, Nebraska to tell them what he had done.  
Within hours, the defendant sent his followers a group text message taking  
back all of his "wives."

9 On or about November 24, 2020, the defendant and co-defendants NAOMI  
10 BISTLINE and JOSEPHINE BARLOW BISTLINE took co-defendants  
11 JOSEPHINE BARLOW BISTLINE's and LADELL BISTLINE, JR.'s  
12 daughters, Jane Does 8 and 9, along with co-defendant MORETTA ROSE  
13 JOHNSON (then age seventeen) and Jane Doe 3, to Cedar City, Utah, where  
they were stopped by law enforcement.

14 On or about November 24, 2020, after the law enforcement contact, and  
15 when they returned to Colorado City, Arizona, the defendant held Jane Doe  
8's hand and said, "did you know that you belong to me?"

16 On or between November 24, 2020 and August 27, 2022, the defendant took  
17 Jane Doe 8 (then age nine or ten) as a child "bride." On or about November  
18 24, 2020, after returning to Colorado City, Arizona, the defendant told co-  
19 defendant NAOMI BISTLINE and Jane Doe 3 to comfort co-defendant  
LADELL BISTLINE, JR. in a vehicle.

20 On or between November 25 and November 27, 2020, the defendant  
21 coordinated group sexual activity in a hotel room in Colorado Springs,  
22 Colorado, with some individuals participating via video call. The defendant  
23 told M.J. to have sex with co-defendant JOSEPHINE BARLOW BISTLINE  
24 while the defendant had sex with Z.B. Co-defendants NAOMI BISTLINE  
25 and MORETTA ROSE JOHNSON (then age seventeen), and Jane Doe 3,  
26 were also present and naked. M.J. initiated a video call with his wives, J.J.  
27 and P.B. The defendant initiated a video call with co-defendants MARONA  
28 JOHNSON and BRENDA BARLOW, and Jane Doe 6 also participated in  
the video call. The defendant also initiated a video call with co-defendant  
LADELL BISTLINE, JR., who was in Colorado City, Arizona. The  
defendant told everyone to be undressed so they could be part of it. The  
video participants, including Jane Doe 6, were naked.

1 On or between November 21 and November 28, 2020, the defendant sent an  
2 email to co-defendant LEIA BISTLINE saying God told him she had  
3 something to tell him. On or about November 28, 2020, the defendant sent  
4 a group text message informing everyone that co-defendant LEIA BISTLINE  
5 said God told her she belonged in the defendant's family.

6 On or between December 3 and December 6, 2020, the defendant picked up  
7 co-defendant LEIA BISTLINE from Monument, Colorado, to take her back  
8 to Lincoln, Nebraska. On or about December 5, 2020, the defendant took  
9 co-defendant LEIA BISTLINE as a "wife."

10 On or between December 20, 2020 and January 1, 2021, the defendant  
11 coordinated another group sexual activity in a hotel in Lincoln, Nebraska.  
12 M.J., J.J., Z.B., G.B. (a spiritual "wife" of co-defendant LADELL  
13 BISTLINE, JR.), and co-defendants DONNAE BARLOW, LADELL  
14 BISTLINE, JR., MARONA JOHNSON, and BRENDA BARLOW were  
15 present, as well as some of the minors. The defendant brought wine and told  
16 everyone to get naked. The defendant had sex with M.J., while the women  
17 and girls assisted the defendant in getting an erection.

18 On or about December 21, 2020, the defendant told M.B. (then age eighteen)  
19 she would be banished from eternal salvation if she would not follow him.

20 On or about December 25, 2020, the defendant touched Jane Doe 3's vagina  
21 in Lincoln, Nebraska, in her father M.J.'s bedroom that he gave to the  
22 defendant.

23 On or between December 31, 2020 and January 1, 2021, the defendant  
24 "rebuked" his "wives," including his child "brides," and told them to factory  
25 reset their phones.

26 On or between January 1, 2021 and September 12, 2022, the defendant was  
27 "intimate" with Jane Doe 7 (then age twelve or thirteen), in Colorado City,  
28 Arizona.

On or between January 1 and March 18, 2021, the defendant moved his  
"wives," including his child "brides," and other followers to Colorado City,  
Arizona.

On or about January 15, 2021, Jane Doe 7 was transported from Lincoln,  
Nebraska, and arrived in Colorado City, Arizona on January 16, 2021.

On or about January 18, 2021, the defendant, with some of his "wives" and

1 followers, traveled to Lincoln, Nebraska from Colorado City, Arizona.

2 On or between January 1 and March 1, 2021, M.B.B. and her daughter, Jane  
3 Doe 10 (then age fourteen), moved from Monument, Colorado to Colorado  
4 City, Arizona, around the same time the defendant and his "wives" were also  
moving back to Colorado City, Arizona.

5 On or between January 1 and April 30, 2021, the defendant slept with Jane  
6 Doe 10 and multiple "wives," including co-defendants NAOMI BISTLINE  
7 and LEIA BISTLINE. The defendant ordered everyone to take their clothes  
8 off, and the defendant had sex with co-defendant LEIA BISTLINE in front  
of and next to Jane Doe 10.

9 On or between January 28 and November 5, 2021, defendant took Jane Doe  
10 9 (then age eleven) as a child "bride."

11 On or between January 1, 2021 and August 27, 2022, in Colorado City,  
12 Arizona, the defendant had sex with co-defendant MARONA JOHNSON in  
13 front of some of the minor girls, including Jane Doe 10, while some of the  
girls were touching the defendant.

14 On or between January 1, 2021 and August 27, 2022, in the green house, in  
15 Colorado City, Arizona, the defendant engaged in group sexual activity with  
16 Jane Does 3, 4, 7 and 10, and co-defendants NAOMI BISTLINE, BRENDA  
BARLOW and LEIA BISTLINE.

17 On or about February 21, 2021, M.J. and co-defendant LADELL BISTLINE,  
18 JR. dedicated to the defendant on a group call that they had given everything  
19 to the defendant, whom they referenced as "President Samuel R. Bateman,"  
20 to include their "wives" and their children. The call was audio recorded and  
uploaded to YouTube.

21 On or about March 2, 2021, Jane Doe 11 went upstairs to the defendant with  
22 her mother (co-defendant LEILANI BISTLINE) to dedicate her life to  
23 "Father" (the defendant).

24 On or about March 3, 2021, Jane Doe 11 "married" the defendant.

25 On or about March 8, 2021, the defendant asked Jane Doe 10 if she had a  
26 testimony of where she was supposed to be.

27 On or between March 12 and March 13, 2021, the defendant took Jane Does  
28 3, 4, 7, 9, and 11, and co-defendant NAOMI BISTLINE and others, back to

1 Lincoln, Nebraska to pick up Jane Doe 5 and the rest of the defendant's  
2 "wives" and their babies.

3 On or about March 15, 2021, in separate vehicles, the defendant and some of  
4 his "wives" started traveling back to Colorado City, Arizona, from Lincoln,  
5 Nebraska.

6 On or about March 16, 2021, co-defendant BRENDA BARLOW and others  
7 decorated the room for S.B. and Jane Doe 10, who were recently "married"  
8 to the defendant. The defendant arrived in Colorado City, Arizona that night.

9 On or about March 17, 2021, the defendant asked Jane Doe 10 to come to his  
10 room. Co-defendant LEIA BISTLINE brought Jane Doe 10 into the room  
11 where the defendant was with some of his other adult "wives." The other  
12 "wives" left, but co-defendant LEIA BISTLINE stayed. The defendant  
13 asked if Jane Doe 10 felt left out when she saw other girls touching him. She  
14 said "no," and the defendant said she was lying because he could see it in her  
15 eyes. The defendant then asked if she wanted to come to him, and she said  
16 "yes." They hugged and kissed, and the defendant told her she kissed just  
17 like co-defendant LEIA BISTLINE. The defendant and Jane Doe 10 laid  
18 together and she held his hand, touched his hair, and "touched him" all night  
19 long. Jane Doe 10 believed another girl was in bed with them. The next  
20 morning, the defendant woke up Jane Doe 10 by kissing her face all over.

21 On or about March 18, 2021, Jane Doe 11 and the people with whom she was  
22 traveling returned to Colorado City, Arizona.

23 On or between April 1 and April 30, 2021, the defendant had sex with Jane  
24 Doe 10, while co-defendant NAOMI BISTLINE, Jane Doe 5, and possibly  
25 Jane Doe 7 were present. Jane Doe 5 held Jane Doe 10's hand while the  
26 defendant was having sex with Jane Doe 10.

27 On or between April 1, 2021 and September 12, 2022, the defendant had anal  
28 sex with Jane Doe 10 (then age fourteen or fifteen).

On or between May 8 and May 11, 2021, the defendant and his "wives,"  
including his child "brides," moved into the green house in Colorado City,  
Arizona.

On or about May 9, 2021, the defendant "married" Jane Doe 11's mother,  
co-defendant LEILANI BISTLINE.

On or about June 21, 2021, the defendant sent a group message to his "wives"

1 and followers that he would not go to the blue house until J.J. stops  
2 "bitching." J.J. was residing in the blue house with M.J. and the others who  
3 were not "married" to the defendant.

4 On or about June 29, 2021, as recorded by Jane Doe 10, the defendant took  
5 Jane Doe 10 for a ride to the creek, where they "worshipped our God in an  
6 unexpressable way" and had "holy sex."

7 On or between August 1, 2021 and August 9, 2022, in the green house in  
8 Colorado City, Arizona, the defendant had sex with Jane Doe 6 (then  
9 between ages ten and twelve), in front of Jane Doe 10 (then between ages  
10 fourteen and fifteen).

11 On or between August 1, 2021 and September 12, 2022, the defendant  
12 admitted to M.J. that he had anal sex with M.J.'s daughter, Jane Doe 6 (then  
13 between ages ten and twelve).

14 On or between August 1 and August 31, 2021, the defendant took Jane Doe  
15 3 (then age fifteen) to Pigeon Canyon, Arizona, for their anniversary. They  
16 had sex. Jane Doe 3 described that the defendant would put his penis inside  
17 of her and then pull it out because he didn't want to get her pregnant.

18 On or about September 7, 2021, as recorded by Jane Doe 10, the defendant  
19 "slept" with Jane Doe 10 (then age fifteen).

20 On or between October 18 and October 19, 2021, co-defendant TORRANCE  
21 BISTLINE purchased a Bentley for the defendant.

22 On or about November 1, 2021, co-defendant LEIA BISTLINE contacted  
23 Jane Doe 7 and told her God had a "sacred mission" for her. Co-defendants  
24 LEIA BISTLINE and JOSEPHINE BARLOW BISTLINE picked up Jane  
25 Doe 7 and co-defendant NAOMI BISTLINE to take them to this "sacred  
26 mission." The defendant gave Jane Doe 7 (then age twelve) to co-defendant  
27 TORRANCE BISTLINE and watched him have anal sex with her. The  
28 defendant also gave co-defendant NAOMI BISTLINE to co-defendant  
LADELL BISTLINE, JR. and watched them have sex. The defendant called  
M.J. and told him to come over to his house in Colorado City, Arizona. M.J.  
arrived with his "wife," P.B. Co-defendant JOSEPHINE BARLOW  
BISTLINE answered the door and took them to the defendant's bedroom.  
Co-defendants LEIA BISTLINE and JOSEPHINE BARLOW BISTLINE,  
and Jane Doe 5 (then age fourteen) were all there with the defendant, and  
they were all naked. The defendant said the Lord was requiring him to  
conduct a "sacred ordinance." He said "[co-defendant LEIA BISTLINE] is

1 with child and the Lord wants you [M.J.] to be with her, and I will be with  
2 [P.B.].” The defendant performed sex acts with co-defendant LEIA  
3 BISTLINE and Jane Doe 5. He touched Jane Doe 5’s breasts and vagina.  
4 Later, the defendant announced what happened to all of his followers and  
5 explained that it was an “atonement” requiring him to sacrifice his most  
6 precious possessions, meaning his “wives” and child “brides.”

7 That night of the “atonement,” the defendant had sex with co-defendant  
8 NAOMI BISTLINE, while Jane Doe 11 was touching the defendant.

9 On or about November 5, 2021, the defendant and co-defendants NAOMI  
10 BISTLINE and TORRANCE BISTLINE went to Salt Lake City, Utah to  
11 pick up the second Bentley co-defendant TORRANCE BISTLINE purchased  
12 for the defendant.

13 On or about November 13, 2021, the defendant and others went to Salt Lake  
14 City, Utah, to pick up two Range Rovers, one of which was purchased by co-  
15 defendant LADELL BISTLINE, JR.

16 On or about January 29, 2022, the defendant took M.B., S.B., co-defendant  
17 LEIA BISTLINE, and Jane Doe 10 (then age fifteen) to a hotel room in  
18 Colorado. The defendant wanted M.B. to sleep with him, but she refused.  
19 He slept with Jane Doe 10 under a blanket and touched her vagina. Jane Doe  
20 10 said it was not sex, but it kind of felt like it.

21 On or about February 16, 2022, the defendant traveled with Jane Doe 9 (then  
22 age twelve) and others to Las Vegas, Nevada, where they stayed in a hotel,  
23 and the defendant “slept” with Jane Doe 9.

24 On or about April 15, 2022, the defendant told M.B. to move her office to  
25 the blue house (John’s) and not come to the green house (Roy’s) because the  
26 defendant needed to teach and train his family. The defendant was angry  
27 with M.B. for not submitting to him.

28 On or between July 1 and September 12, 2022, the defendant had sex with  
Jane Doe 3 (then age sixteen) at campsites they visited that summer,  
including one in Apple Valley, Utah.

On or about August 28, 2022, the defendant was driving on the highway in  
Arizona with Jane Does 4, 7, and 8 in an attached box trailer. The defendant,  
co-defendants NAOMI BISTLINE and MORETTA ROSE JOHNSON, and  
Jane Does 9 and 10 (sitting in the passenger compartment) were pulled over  
by the Arizona Department of Public Safety. The defendant was arrested and



1 his cell phone was seized.

2 On or about August 28, 2022, the defendant called co-defendant  
3 TORRANCE BISTLINE from custody and told him to delete the defendant's  
4 Signal account, after the defendant's phone was seized by law enforcement.

5 On or about August 28, 2022, the defendant called his "wives" and instructed  
6 co-defendant BRENDA BARLOW to delete his Signal account and every  
7 message "right now," which the wives confirmed they were doing "right  
8 now."

9 On or about September 2, 2022, after the defendant was released on bond  
10 from state custody, the defendant inquired how he could factory reset his  
11 phone.

12 On or between September 2 and September 12, 2022, the defendant had sex  
13 with Jane Doe 5 (then age fifteen) in front of Jane Doe 10 (then age fifteen),  
14 and this was the first time Jane Doe 10 saw the defendant use a condom.

15 On or about September 12, 2022, in a trailer in Utah, the defendant had sex  
16 with Jane Doe 10, while co-defendant BRENDA BARLOW helped by  
17 touching the defendant.

18 On the morning of September 13, 2022, co-defendant BRENDA BARLOW  
19 and Jane Does 9 (then age twelve) and 10 went back to the trailer in Utah,  
20 where the defendant had stayed the night before with Jane Doe 10 and co-  
21 defendant BRENDA BARLOW. That morning, the FBI executed search  
22 warrants in Colorado City, Arizona.

23 On or about September 14, 2022, AZ DCS took legal and physical custody  
24 of the nine minor victims, who were the child "brides" of the defendant.  
25 Some of the adult "wives" snuck the children phones while they were in AZ  
26 DCS custody, so that they could communicate directly with each other, the  
27 defendant, and his "wives" while the defendant was in custody. The  
28 defendant would call and talk to each of the child "brides," telling them what  
he wanted to do to them sexually. Eventually, the defendant and his adult  
"wives" began discussing a plan for the girls to be taken from AZ DCS  
custody.

The defendant instructed his child "brides" what to say if they were ever  
interviewed.

On or about November 27, 2022, co-defendant BRENDA BARLOW

1 communicated with the defendant and many of his followers about the plan  
2 to assist the minor victims in leaving AZ DCS custody. At the time, co-  
3 defendant BRENDA BARLOW was attempting to ascertain Jane Doe 6's  
4 location.

5 Later, on or about November 27, 2022, co-defendants NAOMI BISTLINE,  
6 DONNAE BARLOW, and MORETTA ROSE JOHNSON assisted eight of  
7 the nine minor female victims (three of whom were under the age of fourteen)  
8 to leave the custody of the AZ DCS group homes in which they were staying  
9 pending delinquency proceedings following the September 13, 2022 arrest  
10 of the defendant, and their Court Authorized Removals.

11 Specifically, co-defendants NAOMI BISTLINE and DONNAE BARLOW  
12 picked up minor victims, Jane Does 7, 8, and 9, after the girls left AZ DCS  
13 custody on or about November 27, 2022.

14 Co-defendant MORETTA ROSE JOHNSON picked up minor victims, Jane  
15 Does 3, 4, 5, 10 and 11, after they left AZ DCS custody on or about  
16 November 27, 2022.

17 On the evening of November 27, 2022, the defendant made a recorded video  
18 call from the Core Civic/Central Arizona Florence Correctional Complex  
19 ("CAFCC"), where he was in federal custody, to co-defendant DONNAE  
20 BARLOW. During the video call, co-defendant DONNAE BARLOW was  
21 driving a vehicle and co-defendant NAOMI BISTLINE was the front-seat  
22 passenger. Co-defendant NAOMI BISTLINE informed the defendant that  
23 they had Jane Does 8 and 9, referenced by code names.

24 On or between November 27, 2022 and December 1, 2022, co-defendant  
25 BRENDA BARLOW communicated with and between the defendant and  
26 others to ascertain the status of the minor female victims and provide updates  
27 to the defendant.

28 On the morning of November 28, 2022, the defendant made a video call from  
CAFCC to co-defendant NAOMI BISTLINE, who appeared to be in a hotel  
room. In response to the defendant's questioning about who was with them,  
co-defendant NAOMI BISTLINE told the defendant that "W2" (a reference  
to Jane Doe 6, the only one of the nine girls to have not escaped from AZ  
DCS custody) was the only one not with them, but that they had tried and ran  
for their lives after police were called. The defendant told them they needed  
to get "W2." The video panned to all eight minors taken from AZ DCS  
custody.

1 In the following days, the defendant made numerous video calls to co-  
2 defendant NAOMI BISTLINE and the missing girls. At one point, the  
3 defendant asked if they were in "our state" and they stated that they were not.

4 On or about November 28, 2022, the defendant made video calls to co-  
5 defendant MORETTA ROSE JOHNSON's phone, where he spoke with co-  
6 defendant MARONA JOHNSON, who appeared to be in a hotel room with  
7 a baby and at least one other adult wife of the defendant. They talked about  
8 being a long way away. Co-defendant MARONA JOHNSON told the  
9 defendant that "we are helping you." The defendant encouraged co-  
10 defendant MARONA JOHNSON to stay strong.

11 After discussions about needing more vehicles, on another call on or about  
12 the evening of November 28, 2022, co-defendant LEILANI BISTLINE  
13 reported to the defendant that she had cleaned out one of the vehicles and she  
14 and co-defendant JOSEPHINE BARLOW BISTLINE were able to swap out  
15 vehicles with the other wives of the defendant.

16 In the days following the girls' disappearance, co-defendant BRENDA  
17 BARLOW was communicating with the defendant and all of his followers,  
18 coordinating and reporting everybody's whereabouts.

19 On or about December 1, 2022, all eight missing girls were found in Spokane,  
20 Washington.

21 b. The defendant shall swear under oath to the accuracy of this statement and,  
22 if the defendant should be called upon to testify about this matter in the future, any  
23 intentional material inconsistencies in the defendant's testimony may subject the defendant  
24 to additional penalties for perjury or false swearing, which may be enforced by the United  
25 States under this agreement.

#### 26 APPROVAL AND ACCEPTANCE OF THE DEFENDANT

27 I have read the entire plea agreement with the assistance of my attorney. I  
28 understand each of its provisions and I voluntarily agree to it.

I have discussed the case and my constitutional and other rights with my attorney.  
I understand that by entering my plea of guilty I shall waive my rights to plead not guilty,

1 to trial by jury, to confront, cross-examine, and compel the attendance of witnesses, to  
2 present evidence in my defense, to remain silent and refuse to be a witness against myself  
3 by asserting my privilege against self-incrimination, all with the assistance of counsel, and  
4 to be presumed innocent until proven guilty beyond a reasonable doubt.

5 I agree to enter my guilty plea as indicated above on the terms and conditions set  
6 forth in this agreement.

7 I have been advised by my attorney of the nature of the charges to which I am  
8 entering my guilty plea. I have further been advised by my attorney of the nature and range  
9 of the possible sentence and that my ultimate sentence shall be determined by the Court  
10 after consideration of the advisory Sentencing Guidelines.

11 My guilty plea is not the result of force, threats, assurances, or promises, other than  
12 the promises contained in this agreement. I voluntarily agree to the provisions of this  
13 agreement and I agree to be bound according to its provisions.

14 I understand that if I am granted probation or placed on supervised release by the  
15 Court, the terms and conditions of such probation/supervised release are subject to  
16 modification at any time. I further understand that if I violate any of the conditions of my  
17 probation/supervised release, my probation/supervised release may be revoked and upon  
18 such revocation, notwithstanding any other provision of this agreement, I may be required  
19 to serve a term of imprisonment or my sentence otherwise may be altered.

20 This written plea agreement, and any written addenda filed as attachments to this  
21 plea agreement, contain all the terms and conditions of the plea. Any additional  
22 agreements, if any such agreements exist, shall be recorded in a separate document and  
23 may be filed with the Court under seal; accordingly, additional agreements, if any, may not  
24 be in the public record.

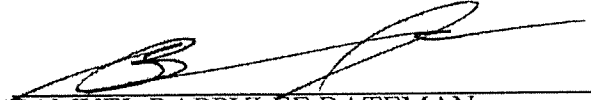
25 I further agree that promises, including any predictions as to the Sentencing  
26 Guideline range or to any Sentencing Guideline factors that will apply, made by anyone  
27 (including my attorney) that are not contained within this written plea agreement, are null  
28 and void and have no force and effect.

1 I am satisfied that my defense attorney has represented me in a competent manner.

2 I fully understand the terms and conditions of this plea agreement. I am not now  
3 using or under the influence of any drug, medication, liquor, or other intoxicant or  
4 depressant that would impair my ability to fully understand the terms and conditions of this  
5 plea agreement.

6  
7 3-18-24

8 Date

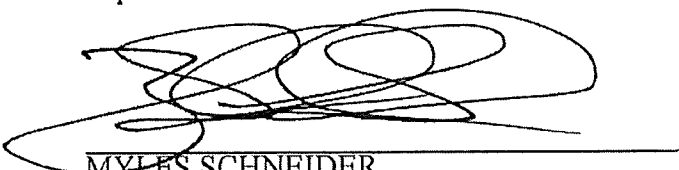
  
9 SAMUEL RAPPYLEE BATEMAN  
10 Defendant

11 **APPROVAL OF DEFENSE COUNSEL**

12 I have discussed this case and the plea agreement with my client in detail and have advised  
13 the defendant of all matters within the scope of Fed. R. Crim. P. 11, the constitutional and  
14 other rights of an accused, the factual basis for and the nature of the offense to which the  
15 guilty plea will be entered, possible defenses, and the consequences of the guilty plea  
16 including the maximum statutory sentence possible. I have further discussed the concept  
17 of the advisory Sentencing Guidelines with the defendant. No assurances, promises, or  
18 representations have been given to me or to the defendant by the United States or any of  
19 its representatives that are not contained in this written agreement. I concur in the entry of  
20 the plea as indicated above and that the terms and conditions set forth in this agreement are  
21 in the best interests of my client. I agree to make a bona fide effort to ensure that the guilty  
22 plea is entered in accordance with all the requirements of Fed. R. Crim. P. 11.

23 3-18-24

24 Date

  
25 MYLES SCHNEIDER  
26 Attorney for the Defendant  
27  
28

**APPROVAL OF THE UNITED STATES**

I have reviewed this matter and the plea agreement. I agree on behalf of the United States that the terms and conditions set forth herein are appropriate and are in the best interests of justice.

GARY M. RESTAINO  
United States Attorney  
District of Arizona

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SAMPSON  
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Date

DIMITRA H. SAMPSON  
JILLIAN BESANCON  
RYAN POWELL  
Assistant U.S. Attorneys

**ACCEPTANCE BY THE COURT**

\_\_\_\_\_  
Date

HONORABLE SUSAN M. BRNOVICH  
United States District Judge